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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

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Jonas Hollins,

Plaintiff,

*versus*

Halliburton Company, *et al.*,

Defendants.

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Civil Action H-14-1004

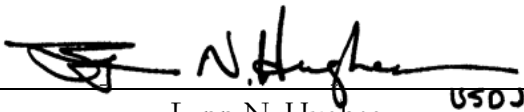
### Order for Disclosure

- I. By July 7, 2014, the company will furnish to the worker:
  - A. The worker's performance and personnel records. If performance is at issue, the operating records that describe the disciplinary measures taken and a list of co-workers, customers, suppliers, or others who know about the alleged incidents.
  - B. The worker's rank, pay, and assignment records for his entire tenure.
  - C. The names of persons who made employment decisions involving the worker and the names of their supervisors.
  - D. The names of human resources or other employees involved.
  - E. An organization chart with names, titles, and job descriptions from two levels above through one level below the worker's position. If there has been a re-organization, furnish a chart for before and after it.
  - F. The specifics of the division that employed the worker, including an organization chart illustrating how the division fits within the company.

- G. The precise name of the worker's actual employer.
  - H. Resumes for workers who replaced the plaintiff or absorbed his work.
  - I. Demographic data on employees who served at the worker's job level and location. Include tenure, experience, education, age, sex, ethnicity, and race.
  - J. Demographic data on the applicants for positions the worker applied for or sought.
  - K. The worker's internal e-mails.
2. By July 7, 2014, the worker will furnish to the company:
- A. No more than two pages identifying how, when, and by whom he was mistreated. If the claim includes oral characterizations, furnish exact phrasing, witnesses, dates, and places.
  - B. A list of others who can corroborate mistreatment.
  - C. A list of employees who the worker says were treated better than he under similar circumstances.
  - D. The worker's employment history for the ten years before joining or applying to the company.
  - E. A list of sources and amounts of income since the worker left the company.
  - F. A list of positions applied for—including when, where, for what job, and with whom—since leaving the company.
  - G. Notes, calendars, diaries, or journals kept during employment with the company.

- H. A list of all mental and physical health professionals the worker has visited for the last ten years, including the date, place, and reason. Furnish the records—not a release—for each visit that the worker says is causally related to his employment.
  - I. An itemization of damages with the method of calculation.
  - J. A separate, precise, factual description of the basis for having sued each defendant other than the employer itself.
- 3. The company and worker will file a *joint* chronology from the time the worker applied to work until he left or sued. This will include only significant events given in an objective, factual form; legal posturing, abstractions, and quibbling will be crushed.
  - 4. The parties may not delay exchanging this information, even by agreement. If a particular in this order does not fit your case, make similar disclosures that reasonably fit your issues.

Signed on May 5, 2014, at Houston, Texas.

  
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Lynn N. Hughes  
United States District Judge

USDC